

**FILED**

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JAN - 7 2010  
Jan 7 2010  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

Wanda Harold n/k/a \_\_\_\_\_ )  
Amanda MacGregor \_\_\_\_\_ )  
\_\_\_\_\_) )  
\_\_\_\_\_) )  
(Name of the plaintiff or plaintiffs) \_\_\_\_\_ )  
v. \_\_\_\_\_ )  
De Paul University \_\_\_\_\_ )  
\_\_\_\_\_) )  
\_\_\_\_\_) )  
(Name of the defendant or defendants) \_\_\_\_\_ )

CIVIL ACTION

N 1:10-cv-00107  
Judge Marvin E. Aspen  
Magistrate Judge Michael T. Mason

**COMPLAINT OF EMPLOYMENT DISCRIMINATION**

1. This is an action for employment discrimination.
2. The plaintiff is Wanda Harold n/k/a Amanda MacGregor of the  
county of Cook in the state of Illinois.
3. The defendant is De Paul University, whose  
street address is 990 W. Fullerton Avenue,  
(city) Chicago (county) Cook (state) IL (ZIP) 60614  
(Defendant's telephone number) (773) - 325-7000
4. The plaintiff sought employment or was employed by the defendant at (street address)  
990 W. Fullerton Avenue (city) Chicago  
(county) Cook (state) IL (ZIP code) 60614

5. The plaintiff [*check one box*]

- (a) ☐ was denied employment by the defendant.
- (b) ☐ was hired and is still employed by the defendant.
- (c) ☒ was employed but is no longer employed by the defendant.

6. The defendant discriminated against the plaintiff on or about, or beginning on or about,  
(month) April, (day) 10, (year) 2006.

7.1 (*Choose paragraph 7.1 or 7.2, do not complete both.*)

(a) The defendant is not a federal governmental agency, and the plaintiff [*check one box*] ☐ *has not* filed a charge or charges against the defendant asserting the acts of discrimination indicated in this complaint with any of the following government agencies: ☒ *has*

- (i) ☒ the United States Equal Employment Opportunity Commission, on or about  
(month) 9 (day) 12 (year) 2006, and 11/14/06; 9/1/08
- (ii) ☐ the Illinois Department of Human Rights, on or about  
(month) \_\_\_\_\_ (day) \_\_\_\_\_ (year) \_\_\_\_\_.

(b) If charges *were* filed with an agency indicated above, a copy of the charge is attached. ☒ YES. ☐ NO, but plaintiff will file a copy of the charge within 14 days.

It is the policy of both the Equal Employment Opportunity Commission and the Illinois Department of Human Rights to cross-file with the other agency all charges received. The plaintiff has no reason to believe that this policy was not followed in this case.

7.2 The defendant is a federal governmental agency, and

- (a) the plaintiff previously filed a Complaint of Employment Discrimination with the defendant asserting the acts of discrimination indicated in this court complaint.

☐ Yes (month)\_\_\_\_\_ (day)\_\_\_\_\_ (year)\_\_\_\_\_

☐ No, did not file Complaint of Employment Discrimination

(b) The plaintiff received a Final Agency Decision on (month)\_\_\_\_\_  
(day)\_\_\_\_\_ (year)\_\_\_\_\_.

(c) Attached is a copy of the

(i) Complaint of Employment Discrimination,

☐ YES ☐ NO, but a copy will be filed within 14 days.

(ii) Final Agency Decision

☐ YES ☐ NO, but a copy will be filed within 14 days.

8. (Complete paragraph 8 only if defendant is not a federal governmental agency.)

(a) ☐ the United States Equal Employment Opportunity Commission has not issued  
a *Notice of Right to Sue*.

(b) ☒ the United States Equal Employment Opportunity Commission has issued a  
*Notice of Right to Sue*, which was received by the plaintiff on  
(month) October (day) 16 (year) 2009 a copy of which  
*Notice* is attached to this complaint.

9. The defendant discriminated against the plaintiff because of the plaintiff's [*check only those that apply*]:

(a) ☐ Age (Age Discrimination Employment Act).

(b) ☐ Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).

- (c) ☐ Disability (Americans with Disabilities Act or Rehabilitation Act)
- (d) ☐ National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (e) ☒ Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (f) ☐ Religion (Title VII of the Civil Rights Act of 1964)
- (g) ☒ Sex (Title VII of the Civil Rights Act of 1964)
10. If the defendant is a state, county, municipal (city, town or village) or other local governmental agency, plaintiff further alleges discrimination on the basis of race, color, or national origin (42 U.S.C. § 1983).
11. Jurisdiction over the statutory violation alleged is conferred as follows: for Title VII claims by 28 U.S.C. §1331, 28 U.S.C. §1343(a)(3), and 42 U.S.C. §2000e-5(f)(3); for 42 U.S.C. §1981 and §1983 by 42 U.S.C. §1988; for the A.D.E.A. by 42 U.S.C. §12117; for the Rehabilitation Act, 29 U.S.C. § 791.
12. The defendant [*check only those that apply*]
- (a) ☐ failed to hire the plaintiff.
- (b) ☒ terminated the plaintiff's employment.
- (c) ☐ failed to promote the plaintiff.
- (d) ☐ failed to reasonably accommodate the plaintiff's religion.
- (e) ☐ failed to reasonably accommodate the plaintiff's disabilities.
- (f) ☐ failed to stop harassment;
- (g) ☒ retaliated against the plaintiff because the plaintiff did something to assert rights protected by the laws identified in paragraphs 9 and 10 above;
- (h) ☒ other (specify): failed to provide comparable private office space, funding to attend conferences, teaching/research assistants as received by male/non-White colleagues.

The defendant succeeded in assigning me unreasonable and  
outrageous tasks not required of my male/non-White colleagues.

Paid me less than amount stated in my contract. Subjected me  
to a hostile work environment.

13. The facts supporting the plaintiff's claim of discrimination are as follows:

Please see attachment.

14. **[AGE DISCRIMINATION ONLY]** Defendant knowingly, intentionally, and willfully discriminated against the plaintiff.

15. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

16. THEREFORE, the plaintiff asks that the court grant the following relief to the plaintiff  
*[check only those that apply]*

- (a) ☐ Direct the defendant to hire the plaintiff.  
(b) ☐ Direct the defendant to re-employ the plaintiff.  
(c) ☐ Direct the defendant to promote the plaintiff.  
(d) ☐ Direct the defendant to reasonably accommodate the plaintiff's religion.  
(e) ☐ Direct the defendant to reasonably accommodate the plaintiff's disabilities.  
(f) ☒ Direct the defendant to (specify): Positive letter of recommendation

Update my photo collection with my new legal name and return to title

Use of De Paul Career Center

Ability to take classes through De Paul Instructional  
Technology Development (ITD) Department free of charge

- (g) ☒ If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.
- (h) ☒ Grant such other relief as the Court may find appropriate.

(Plaintiff's signature)

Amanda MacGregor

(Plaintiff's name)

Amanda MacGregor

(Plaintiff's street address)

1008 Crain St. #3B

Evanston, IL 60202

(City) Evanston (State) IL (ZIP) 60202

(Plaintiff's telephone number) (847) - 424-1437

Date: January 7, 2010

## COMPLAINT

Wanda Harold n/k/a Amanda MacGregor v. De Paul University

13. I was hired by the Defendant in September of 1995 as an instructor in the Department of Sociology. Over the course of my appointment there, my work was beyond reproach; I received consistently favorable evaluations from my students, was on time for my classes and did not cancel classes. I had no write-ups or disciplinary problems. I got along well with students, staff, and faculty.

I was subjected to different terms and conditions of my employment because of my race-White and sex-female. The Defendant denied me private office space, denied me financial compensation to attend professional conferences, did not provide teaching and/or research assistants while the White, Asian, African, and Native-American males in the Sociology Department under the same contract as I, were provided these benefits. This has resulted in a loss of recognition and potential career advancement and opportunities. During the Defendant's alliance with Barat College in Lake Forest, I was singled out to make the lengthy commute to teach there while my White, Asian, African, and Native-American male colleagues were not. I also discovered the University paying me less than the amount stipulated in my contracts.

Despite my excellent evaluations from students, I was demoted by being given fewer and fewer upper level sociology courses to teach, and then almost exclusively non-sociology, general studies courses.

The female department chair subjected me to a hostile work environment by making sarcastic comments about my professional clothes and overall appearance. On not one occasion did I receive a performance evaluation from her or any comments whatsoever about my work—only about my appearance. My attempts to discuss my concerns with the Department chair resulted in gales of laughter from her or threats to not renew my contract.

I filed a charge with the EEOC in September, 2006. In November, 2006 the Defendant removed my name from the title of a collection of over 200 photographs I took and that are housed in the University's Richardson library. I believe I have been retaliated against because I filed a charge with the EEOC.

In 2002 I was invited to join the Sociology faculty full time on an annual contract. I was not informed either verbally or in writing at that time that this was a fixed-term appointment of 6 years. On March 5, 2008 I was informed of my discharge effective June 30, 2008. Two of my male colleagues fulfilled their 6<sup>th</sup> year of employment and were not discharged. I believe I have been discriminated against on the basis of my sex-female, and retaliated against for filing charges with the EEOC.

CHICAGO DISTRICT OFFICE  
EQUAL EMPLOYMENT OPPORTUNITY COMMISSION  
500 WEST MADISON STREET, SUITE 2000  
CHICAGO, ILLINOIS 60661

OFFICIAL BUSINESS

37 moved

**CERTIFIED MAIL**



7000 0600 0022 1007 8803

~~MAGG6613 606574109 1909 33 10/15/05  
NOTIFY SENDER OF NEW ADDRESS  
MAGGREGOR, AMANDA R.  
1008 GRAIN #1 APT 3B  
EVANSTON IL 60202-1246~~

007 8803  
N/L  
Rt  
10/16/03

**五、五十年來中國經濟的變遷**

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**DISMISSAL AND NOTICE OF RIGHTS**

To: **Amanda R. MacGregor**  
(formerly known as Wanda Harold)  
619 W. Stratford Place, Apt. 405  
Chicago, IL 60657

From: **Chicago District Office**  
500 West Madison St  
Suite 2000  
Chicago, IL 60661

**CERTIFIED MAIL 7000 0600 0022 1007 8810**



On behalf of person(s) aggrieved whose identity is  
**CONFIDENTIAL (29 CFR §1601.7(a))**

EEOC Charge No.

EEOC Representative

Telephone No.

**440-2008-08059**

**Amy Burkholder,**  
Investigator

**(312) 353-8906**

**THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:**



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

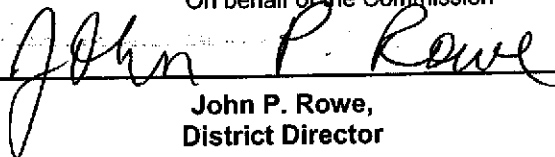
**- NOTICE OF SUIT RIGHTS -**

(See the additional information attached to this form.)

**Title VII, the Americans with Disabilities Act, and/or the Age Discrimination in Employment Act:** This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)

**Equal Pay Act (EPA):** EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission

  
**John P. Rowe,**  
District Director

  
(Date Mailed)

Enclosures(s)

cc: **DEPAUL UNIVERSITY**

**CHARGE OF DISCRIMINATION**

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

☐ FEPA☒ EEOC

440-2006-09461

**Illinois Department Of Human Rights**

and EEOC

State or local Agency, if any

Name (Indicate Mr., Ms., Mrs.)

**Ms. Wanda J. Harold**

Home Phone (Incl. Area Code)

**(773) 929-6513**

Date of Birth

**05-10-1958**

Street Address

City, State and ZIP Code

**619 W. Stratford Place #405, Chicago, IL 60657**

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

**DEPAUL UNIVERSITY**

No. Employees, Members

**500 or More**

Phone No. (Include Area Code)

**(773) 325-7000**

Street Address

City, State and ZIP Code

**990 W. Fullerton, Chicago, IL 60614**

Name

No. Employees, Members

Phone No. (Include Area Code)

Street Address

City, State and ZIP Code

DISCRIMINATION BASED ON (Check appropriate box(es).)

☒ RACE ☐ COLOR ☒ SEX ☐ RELIGION ☐ NATIONAL ORIGIN  
☒ RETALIATION ☐ AGE ☐ DISABILITY ☐ OTHER (Specify below.)

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

Latest

**01-01-2003****09-12-2006**☒ CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

I was hired by Respondent in or about September 1995, as an Instructor. Since January 2003, I have been subjected to different terms and conditions of employment because of my race, White and sex, female. The Respondent denied me a private office for over two years, new computer equipment, the opportunity to teach Sociology graduate courses, and paid me less than agreed upon during contract negotiations. The Respondent has subjected me to harassment by making derogatory comments about my clothes and overall appearance. I have complained to Respondent to no avail. Instead I am threatened with not having next year's contract renewed.

I believe that I have been discriminated against because of my race, White; sex, female and retaliated against for opposing discrimination, in violation of Title VII of the Civil Rights Act of 1964 as amended.

RECEIVED EEOC

SEP 12 2006

CHICAGO DISTRICT OFC

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

NOTARY - When necessary for State and Local Agency Requirements


I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE  
(month, day, year)

Sep 12, 2006

Date



Charging Party Signature

## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

## DISMISSAL AND NOTICE OF RIGHTS

To: **Amanda R. MacGregor**  
(formerly known as Wanda Harold)  
619 W. Stratford Place, Apt. 405  
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From: **Chicago District Office**  
500 West Madison St  
Suite 2000  
Chicago, IL 60661

CERTIFIED MAIL 7000 0600 0022 1008 2497



On behalf of person(s) aggrieved whose identity is  
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

440-2006-09461

**Amy Burkholder,**  
Investigator

(312) 353-8906

**THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:**



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

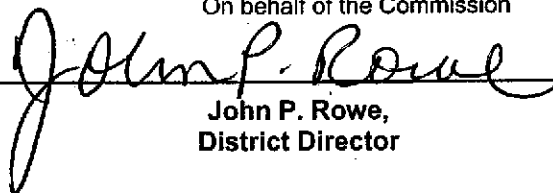
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**Equal Pay Act (EPA):** EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission

  
John P. Rowe,  
District Director

9/29/09  
(Date Mailed)

Enclosures(s)

cc: **DEPAUL UNIVERSITY**

## CHARGE OF DISCRIMINATION

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Charge Presented To:

Agency(ies) Charge No(s):

☐ FEPA☒ EEOC

440-2007-01392

## Illinois Department Of Human Rights

and EEOC

State or local Agency, if any

Name (indicate Mr., Ms., Mrs.)

Ms. Wanda J. Harold

Home Phone (Incl. Area Code)

(773) 929-6513

Date of Birth

05-10-1958

Street Address

City, State and ZIP Code

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Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

DEPAUL UNIVERSITY

No. Employees, Members

500 or More

Phone No. (Include Area Code)

(773) 325-7820

Street Address

City, State and ZIP Code

990 W. Fullerton Ave, Chicago, IL 60614

Name

No. Employees, Members

Phone No. (Include Area Code)

Street Address

City, State and ZIP Code

DISCRIMINATION BASED ON (Check appropriate box(es).)

☐ RACE ☐ COLOR ☐ SEX ☐ RELIGION ☐ NATIONAL ORIGIN  
☒ RETALIATION ☐ AGE ☐ DISABILITY ☐ OTHER (Specify below.)

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

Latest

11-02-2006

11-02-2006

☐

CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

On September 12, 2006, I filed an EEOC Charge (No. 440-2006-09461). After filing my EEOC Charge, on November 2, 2006, Respondent removed my name as headliner of my collection of photographs. This has resulted in loss of prestige and recognition for any potential career advancement and opportunities.

I believe that I have been retaliated against because I filed an EEOC charge, in violation of Title VII of the Civil Rights Act of 1964, as amended.

RECEIVED EEOC

NOV 28 2006

CHICAGO DISTRICT OFC

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

NOTARY - When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

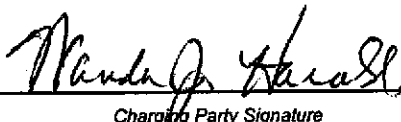
SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE  
(month, day, year)

Nov 28, 2006

Date

Charging Party Signature



## DISMISSAL AND NOTICE OF RIGHTS

To: **Amanda R. MacGregor**  
(formerly known as Wanda Harold)  
619 W. Stratford Place, Apt. 405  
Chicago, IL 60657

From: **Chicago District Office**  
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Suite 2000  
Chicago, IL 60661

CERTIFIED MAIL 7000 0600 0022 1007 8803



On behalf of person(s) aggrieved whose identity is  
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EEOC Charge No.

EEOC Representative

Telephone No.

440-2007-01392

**Amy Burkholder,**  
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(312) 353-8906

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Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



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The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

**- NOTICE OF SUIT RIGHTS -**

(See the additional information attached to this form.)

**Title VII, the Americans with Disabilities Act, and/or the Age Discrimination in Employment Act:** This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)

**Equal Pay Act (EPA):** EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred **more than 2 years (3 years)** before you file suit may not be collectible.

Enclosures(s)

On behalf of the Commission

*John P. Rowe*

**John P. Rowe,**  
District Director

9/29/09

(Date Mailed)

cc: **DEPAUL UNIVERSITY**

**CHARGE OF DISCRIMINATION**

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

☐ FEPA

☒ EEOC

440-2008-08059

and EEOC

State or local Agency, if any

Name (indicate Mr., Ms., Mrs.)

**Amanda R. MacGregor**

Home Phone (Incl. Area Code)

**(773) 929-6513**

Date of Birth

**05-10-1958**

Street Address

City, State and ZIP Code

**619 W. Stratford Place, Apt. 405, Chicago, IL 60657**

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

**DEPAUL UNIVERSITY**

No. Employees, Members

**500 or More**

Phone No. (Include Area Code)

**(773) 325-7820**

Street Address

City, State and ZIP Code

**990 West Fullerton Avenue, Chicago, IL 60614**

Name

No. Employees, Members

Phone No. (Include Area Code)

Street Address

City, State and ZIP Code

DISCRIMINATION BASED ON (Check appropriate box(es).)

☐ RACE ☐ COLOR ☒ SEX ☐ RELIGION ☐ NATIONAL ORIGIN  
☒ RETALIATION ☐ AGE ☐ DISABILITY ☐ OTHER (Specify below.)

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

Latest

**03-05-2008**

**03-05-2008**

☐ CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

- I. I was hired by the above-named Respondent on or about September 1995, as a Lecturer. In 2006, I filed two EEOC Charges (440-2006-09461 & 440-2007-01392). On March 5, 2008, I was informed of my discharge effective June 30, 2008.
- II. I believe that I have been discriminated against on the basis of my sex, female, and retaliated against for engaging in a protected activity, in violation of Title VII of the Civil Rights Act of 1964, as amended.

RECEIVED

SEP 02 2008

CHARGE OF DISCRIMINATION

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

NOTARY - When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE  
(month, day, year)

9/2/2008 Amanda MacGregor  
Date Charging Party Signature